

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

MOTIVATION INNOVATIONS, LLC

Plaintiff,

v.

**EXPRESS, INC., ULTA SALON,
COSMETICS & FRAGRANCE, INC.,
PETSMART, INC., and VICTORIA'S
SECRET STORES, LLC d/b/a VICTORIA'S
SECRET,**

Defendants.

Civil Action No.: 11-00615 (SLR)

JURY TRIAL DEMANDED

MOTION AND ORDER FOR ADMISSION *PRO HAC VICE*

Pursuant to Local Rule 83.5 and the attached certification, counsel moves the admission *pro hac vice* of John F. Ward, Esquire of Ward & Zinna, LLC, 380 Madison Avenue, New York, New York 10017, to represent Defendants Victoria's Secret Stores, LLC and Express, Inc. in the above matter. Pursuant to this Court's Standing Order effective January 1, 2005, I hereby certify that the annual fee for *pro hac* admission for Mr. Ward will be sent as required.

Respectfully submitted,

Date: September 12, 2011

By: /s/ Sheldon K. Rennie
Sheldon K. Rennie (Del. Bar No. 3772)
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*Attorney for Defendants
Victoria's Secret Stores, LLC and Express, Inc.*

CERTIFICATION BY COUNSEL TO BE ADMITTED *PRO HAC VICE*

Pursuant to Local Rule 83.5, I certify that I am eligible for admission to this Court, am admitted, practicing and in good standing as a member of the Bars of the State of New York, State of New Jersey, Southern District of New York, Eastern District of New York, District of New Jersey, U.S. Court of Appeals for the Federal Circuit, and the U.S. Supreme Court, and pursuant to Local Rule 83.6 submit to the disciplinary jurisdiction of this Court for any alleged misconduct which occurs in the preparation or course of this action. I also certify that I am generally familiar with this Court's Local Rules.

In accordance with Standing Order for District Court Fund effective January 1, 2005, I further certify that the annual fee of \$25.00 has been paid to the Clerk of Court, or, if not paid previously, the fee payment will be submitted to the Clerk's Office upon the filing of this motion.

Date: 9/12/2011


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